

**BAKER & HOSTETLER LLP**

ROBERTSON D. BECKERLEGGE (RB 1829)

45 Rockefeller Plaza, 11<sup>th</sup> Floor

New York, NY 10111

Telephone: 212-589-4200

Facsimile: 212-589-4201

Attorneys for Defendant

ALL STAR VACATION MARKETING GROUP,  
INC.

 **ORIGINAL**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GABRIELA CARMONA, on behalf of  
herself and all others similarly situated,

Plaintiff,

-against-

SPANISH BROADCASTING SYSTEMS,  
INC. and ALL STAR VACATION  
MARKETING GROUP, INC.,

Defendants.

Civil Action No. 08-CIV-4475 (LAK)

**NOTICE OF UNOPPOSED MOTION FOR  
THE ADMISSION OF SCOTT E. DAMON AND  
ROBERT W. THIELHELM, JR. AS COUNSEL  
PRO HAC VICE**

**TO:** Jeffrey I. Carton  
Jerome Noll  
Meiselman, Denlea, Packman, Carton &  
Eberz P.C.  
1311 Mamaroneck Avenue  
White Plains, NY 10605  
[jcarton@mdpcelaw.com](mailto:jcarton@mdpcelaw.com)  
[jnoll@mdpcelaw.com](mailto:jnoll@mdpcelaw.com)  
Attorneys for Plaintiff

William C. Zifchak  
Jackie Sumer  
Kaye Scholer LLP  
425 Park Avenue  
New York, NY 10022  
[wzifchak@kayescholer.com](mailto:wzifchak@kayescholer.com)  
[jsumer@kayescholer.com](mailto:jsumer@kayescholer.com)  
Attorneys for Spanish Broadcasting  
Systems, Inc.

PLEASE TAKE NOTICE that upon the annexed Certifications of Scott E. Damon and Robert W. Thielhelm, Jr. in support of this motion, and the Certificates of Good Standing annexed thereto, as well as the supporting Certification of Robertson D. Beckerlegge, Defendant,

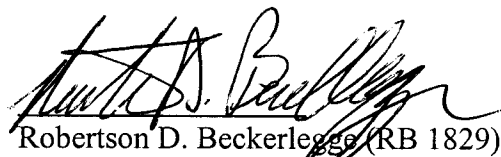
All Star Vacation Marketing Group, Inc. will move this Court before the Honorable Lewis A. Kaplan at the United States Courthouse for the Southern District of New York, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern District of New York, for an order allowing the admission of Scott E. Damon and Robert W. Thielhelm, Jr., members of the firm of Baker & Hostetler LLP and members in good standing of the Florida State Bar, as attorneys pro hac vice to argue or try this case in whole or in part as counsel to Defendant, All Star Vacation Marketing Group, Inc.

In further support of this motion, Defendant, All Star Vacation Marketing Group, Inc. states that there are no pending disciplinary proceedings against Messrs. Damon or Thielhelm in any State or Federal court.

Further, no other party opposes this motion.

WHEREFORE, Defendant, All Star Vacation Marketing Group, Inc., respectfully requests that the Court enter the attached order granting the unopposed motion for the pro hac vice admission of Scott E. Damon and Robert W. Thielhelm, Jr..

Respectfully submitted this 16th day of July, 2008.



Robertson D. Beckerlegge (RB 1829)

**BAKER & HOSTETLER LLP**

45 Rockefeller Plaza, 11<sup>th</sup> Floor

New York, NY 10111

Telephone: 212-589-4200

Facsimile: 212-589-4201

Attorneys for Defendant

ALL STAR VACATION MARKETING  
GROUP, INC.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>th</sup> day of July, 2008, I served a copy of the foregoing **NOTICE OF UNOPPOSED MOTION FOR THE ADMISSION OF SCOTT E. DAMON AND ROBERT W. THIELHELM, JR. AS COUNSEL PRO HAC VICE, CERTIFICATION OF ROBERTSON D. BECKERLEGGE IN SUPPORT OF THE MOTION OF ALL STAR VACATION MARKETING GROUP, INC. FOR THE ADMISSION OF SCOTT E. DAMON AND ROBERT W. THIELHELM, JR. PRO HAC VICE, CERTIFICATION OF SCOTT E. DAMON IN SUPPORT OF APPLICATION FOR ADMISSION PRO HAC VICE, CERTIFICATION OF ROBERT W. THIELHELM, JR. IN SUPPORT OF APPLICATION FOR ADMISSION PRO HAC VICE and ORDER ADMITTING COUNSEL TO PRACTICE PRO HAC VICE** on the following:

Jeffrey I. Carton, Esq.  
Jerome Noll, Esq.  
Meiselman, Denlea, Packman, Carton & Eberz P.C.  
1311 Mamaroneck Avenue  
White Plains, NY 10605  
Email: [jcarton@mdpcelaw.com](mailto:jcarton@mdpcelaw.com) and [jnoll@mdpcelaw.com](mailto:jnoll@mdpcelaw.com)  
Attorneys for Plaintiff

William C. Zifchak, Esq.  
Jackie Sumer, Esq.  
Kaye Scholer LLP  
425 Park Avenue  
New York, NY 10022  
Email: [wzifchak@kayescholer.com](mailto:wzifchak@kayescholer.com) and [jsumer@kayescholer.com](mailto:jsumer@kayescholer.com)  
Attorneys for Spanish Broadcasting System, Inc.

by E-mail and by enclosing a true copy of each document into a first-class post-paid properly addressed wrapper and depositing same into an official depository under the exclusive care and custody of United States Postal Service within the State of New York.



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Theresa Blaber  
Paralegal

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GABRIELA CARMONA, on behalf of  
herself and all others similarly situated,

Plaintiff,

-against-

SPANISH BROADCASTING SYSTEMS,  
INC. and ALL STAR VACATION  
MARKETING GROUP, INC.,

Defendants.

DOCKET NO. 08-CIV-4475 (LAK)

**ORDER ADMITTING COUNSEL TO  
PRACTICE PRO HAC VICE**

This matter comes before the Court on Defendant, All Star Vacation Marketing Group, Inc.'s, unopposed motion to admit counsel pro hac vice.

Upon the matters presented to the Court, it is hereby ORDERED that the motion be, and hereby is, GRANTED.

The admitted attorneys, Scott E. Damon and Robert W. Thielhelm, Jr., are permitted to argue or try this particular case in whole or in part as counsel or advocates for Defendant, All Star Vacation Marketing Group, Inc.

Entered this \_\_\_\_\_ day of \_\_\_\_\_, 2008.

\_\_\_\_\_  
Lewis A. Kaplan-United States District Judge

**BAKER & HOSTETLER LLP**

ROBERTSON D. BECKERLEGGE (RB 1829)

45 Rockefeller Plaza, 11<sup>th</sup> Floor

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Telephone: 212-589-4200

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Attorneys for Defendant

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GABRIELA CARMONA, on behalf of  
herself and all others similarly situated,

Plaintiff,

-against-

SPANISH BROADCASTING SYSTEMS,  
INC. and ALL STAR VACATION  
MARKETING GROUP, INC.,

Defendants.

DOCKET NO. 08-CIV-4475 (LAK)

**CERTIFICATION OF**  
**ROBERTSON D. BECKERLEGGE IN**  
**SUPPORT OF THE MOTION OF ALL STAR**  
**VACATION MARKETING GROUP, INC.**  
**FOR THE ADMISSION OF SCOTT E. DAMON**  
**AND ROBERT W. THIELHELM, JR. PRO**  
**HAC VICE**

ROBERTSON D. BECKERLEGGE states, under penalty of perjury and pursuant to 28  
U.S.C. § 1746:

1. I am a member in good standing of the bar of this Court, having been admitted to practice before the Southern District of New York in October 2001.
2. This certification is made in support of a consented to motion seeking the admission pro hac vice in this action, pursuant to Local Civil Rule 1.3 (c) of the United States Court for the Southern District of New York, of Scott E. Damon and Robert W. Thielhelm, Jr.
3. Messrs. Damon and Thielhelm, who have their offices at 2300 SunTrust Center,


200 South Orange Avenue, Orlando, FL 32801-3432, are Counsel for Defendant, All Star Vacation Marketing Group, Inc. They are members in good standing of the Bar of the State of Florida. *See* Certificates of Good Standing attached to the Certifications of Scott E. Damon and Robert W. Thielhelm, Jr. in support of this motion, submitted herewith.

4. I believe that Messrs. Damon and Thielhelm will conduct themselves in a manner required of attorneys admitted to practice in this Court pro hac vice. I therefore respectfully request that they be allowed to appear pro hac vice in this matter for the purpose of counseling and advocating for Defendant, All Star Vacation Marketing Group, Inc., in this litigation.

Dated: New York, New York

July 16, 2008.

I certify that the foregoing is true and correct.

  
Robertson D. Beckerlegge (RB 1828)  
**BAKER & HOSTETLER LLP**  
45 Rockefeller Plaza, 11<sup>th</sup> Floor  
New York, NY 10111  
Telephone: 212-589-4200  
Facsimile: 212-589-4201  
Attorneys for Defendant  
ALL STAR VACATION MARKETING  
GROUP, INC.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>th</sup> day of July, 2008, I served a copy of the foregoing **NOTICE OF UNOPPOSED MOTION FOR THE ADMISSION OF SCOTT E. DAMON AND ROBERT W. THIELHELM, JR. AS COUNSEL PRO HAC VICE, CERTIFICATION OF ROBERTSON D. BECKERLEGGE IN SUPPORT OF THE MOTION OF ALL STAR VACATION MARKETING GROUP, INC. FOR THE ADMISSION OF SCOTT E. DAMON AND ROBERT W. THIELHELM, JR. PRO HAC VICE, CERTIFICATION OF SCOTT E. DAMON IN SUPPORT OF APPLICATION FOR ADMISSION PRO HAC VICE, CERTIFICATION OF ROBERT W. THIELHELM, JR. IN SUPPORT OF APPLICATION FOR ADMISSION PRO HAC VICE and ORDER ADMITTING COUNSEL TO PRACTICE PRO HAC VICE** on the following:

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Attorneys for Plaintiff

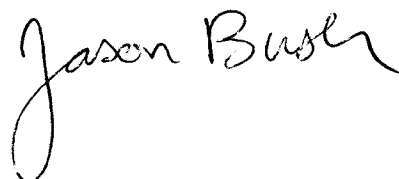
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Attorneys for Spanish Broadcasting System, Inc.

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Theresa Blaber  
Paralegal



**BAKER & HOSTETLER LLP**  
ROBERTSON D. BECKERLEGGE (RB1829)  
45 Rockefeller Plaza, 11<sup>th</sup> Floor  
New York, NY 10111  
Telephone: 212-589-4200  
Facsimile: 212-589-4201  
Attorneys for Defendant  
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 **ORIGINAL**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GABRIELA CARMONA, on behalf of  
herself and all others similarly situated,

Plaintiff,

-against-

SPANISH BROADCASTING SYSTEMS,  
INC. and ALL STAR VACATION  
MARKETING GROUP, INC.,

Defendants.

DOCKET NO. 08-CIV-4475 (LAK)

**CERTIFICATION OF SCOTT E. DAMON IN  
SUPPORT OF APPLICATION FOR  
ADMISSION PRO HAC VICE**

**SCOTT E. DAMON** states, under penalty of perjury and pursuant to 28 U.S.C. § 1746:

1. I am a partner with the law firm of Baker & Hostetler LLP.
2. I submit this certification in support of Defendant, All Star Vacation Marketing Group, Inc.'s, consented to motion seeking my admission *pro hac vice* in the above-captioned action, pursuant to Local Civil Rule 1.3 (c) of the United States Court for the Southern District of New York.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar of the State of Florida.



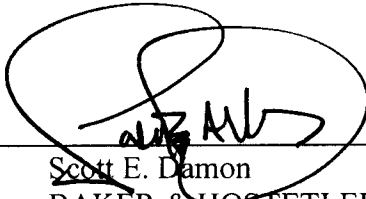
4. There are no pending disciplinary proceedings against me in any State or Federal court.

5. Wherefore, I respectfully request this Court's permission to appear as counsel and advocate pro hac vice in this case.

Dated: Orlando, Florida

July 15<sup>th</sup>, 2008

I certify that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read "Scott E. Damon", is written over a horizontal line. The signature is enclosed within a large, hand-drawn oval.

Scott E. Damon  
BAKER & HOSTETLER LLP  
2300 SunTrust Center  
200 South Orange Avenue  
Orlando, FL 32801-3432  
(407) 649 4000  
(407) 841 0168 (Facsimile)  
[sdamon@bakerlaw.com](mailto:sdamon@bakerlaw.com)

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# The Florida Bar

JOHN F. HARKNESS, JR.  
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET  
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600  
WWW.FLORIDABAR.ORG

State of Florida )

County of Leon )

In Re: 31909  
Scott Eric Damon  
Baker & Hostetler, LLP  
P.O. Box 112  
Orlando, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on October 28, 1994.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 20<sup>th</sup> day of June, 2008.

A handwritten signature in black ink that reads "Willie Mae Shepherd". The signature is written in a cursive, flowing style.

Willie Mae Shepherd  
Supervisor, Membership Records  
The Florida Bar

WMS/smr11:R10

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>th</sup> day of July, 2008, I served a copy of the foregoing **NOTICE OF UNOPPOSED MOTION FOR THE ADMISSION OF SCOTT E. DAMON AND ROBERT W. THIELHELM, JR. AS COUNSEL PRO HAC VICE, CERTIFICATION OF ROBERTSON D. BECKERLEGGE IN SUPPORT OF THE MOTION OF ALL STAR VACATION MARKETING GROUP, INC. FOR THE ADMISSION OF SCOTT E. DAMON AND ROBERT W. THIELHELM, JR. PRO HAC VICE, CERTIFICATION OF SCOTT E. DAMON IN SUPPORT OF APPLICATION FOR ADMISSION PRO HAC VICE, CERTIFICATION OF ROBERT W. THIELHELM, JR. IN SUPPORT OF APPLICATION FOR ADMISSION PRO HAC VICE and ORDER ADMITTING COUNSEL TO PRACTICE PRO HAC VICE** on the following:

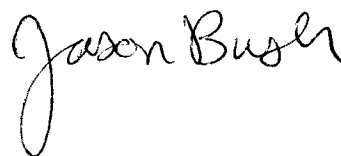
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Attorneys for Plaintiff

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Theresa Blaber  
Paralegal



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THIELHELM, JR. IN SUPPORT OF  
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**ROBERT W. THIELHELM, JR.** states, under penalty of perjury and pursuant to 28  
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1. I am a partner with the law firm of Baker & Hostetler LLP.
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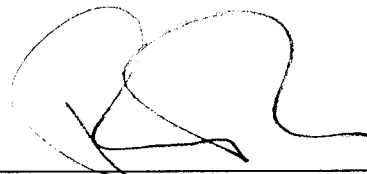
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Dated: Orlando, Florida

July 15, 2008

I certify that the foregoing is true and correct.



---

Robert W. Thielhelm, Jr.  
BAKER & HOSTETLER LLP  
2300 SunTrust Center  
200 South Orange Avenue  
Orlando, FL 32801-3432  
(407) 649 4000  
(407) 841 0168 (Facsimile)  
[rthielhelm@bakerlaw.com](mailto:rthielhelm@bakerlaw.com)

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# The Florida Bar

JOHN F. HARKNESS, JR.  
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET  
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600  
WWW.FLORIDABAR.ORG

State of Florida )

County of Leon )

In Re: 889679  
Robert William Thielhelm, Jr.  
Baker & Hostetler, LLP  
P.O. Box 112  
Orlando, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on September 12, 1991.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 16<sup>th</sup> day of June, 2008.

A handwritten signature in black ink that reads "Willie Mae Shepherd". The signature is fluid and cursive.

Willie Mae Shepherd  
Supervisor, Membership Records  
The Florida Bar

WMS/KLM1:R10

**CERTIFICATE OF SERVICE**

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425 Park Avenue  
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Email: [wzifchak@kayescholer.com](mailto:wzifchak@kayescholer.com) and [jsumer@kayescholer.com](mailto:jsumer@kayescholer.com)  
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